

**LUONGO BELLWOAR LLP**

**BY: Stanley E. Luongo, Esquire**

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**Attorney for: Debtor**

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UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Sierra L. McMonagle : Chapter 13  
:   
Debtor : Bankruptcy No. 19-12751-AMC  
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**DEBTOR'S ANSWER IN OPPOSITION TO MTGLQ INVESTORS, L.P.'S MOTION  
FOR RELIEF FROM THE AUTOMATIC STAY AND CO-DEBTOR STAY**

Debtor, Sierra L. McMongale, by and through her attorney, Stanley E. Luongo,

Jr., Esquire respectfully represent the following:

1. Admitted upon information and belief.
2. Admitted.
3. Admitted upon information and belief.
4. It is admitted that debtor is a Defendant in a mortgage foreclosure

proceeding in the Chester County Court of Common Pleas, Docket No. 2017-05102-RC.

5. Admitted.

6. Denied. To the extent that payments may be delinquent post-petition

debtor would propose to enter into a Stipulation Agreement with Movant prior to the

hearing date on this matter to cure any existing arrears. In addition, debtor tendered

check number 432 in the amount of \$5,000.00 to Movant which was cashed on or about

October 2, 2019. Debtor also tendered check number 435 in the amount of \$1,497.60 to Movant on October 12, 2019. Said payment has not been cashed by Movant as of this date.

7. Denied.

8. Denied.

**WHEREFORE**, debtor respectfully requests that this Honorable Court deny the Motion for Relief from the Automatic Stay of MTGLQ Investors, L.P.

Respectfully Submitted,

**LUONGO BELLOWAR LLP**

BY: /s/Stanley E. Luongo,  
**Stanley E. Luongo, Jr., Esquire**  
**Counsel for Debtor**

Dated: October 14, 2019